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October 17, 2023

Via ECF

Honorable John G. Koeltl, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 14A
New York, NY 10007

RE: *Kevin Campbell v. Zerocater, Inc.*,
Case No. 23-cv-05742 (JGK)

Dear Judge Koeltl:

This office represents Defendant Zerocater, Inc. in the above-referenced action. Defendant writes, with Plaintiff's consent, to respectfully request an extension of time from October 20, 2023, to November 3, 2023, to move to dismiss the complaint. This is Defendant's first request for an extension of time to file its anticipated motion to dismiss. This request is to allow the parties time to execute a confidentiality agreement and exchange information regarding pertinent jurisdictional issues in an effort to reach a resolution of the issues Defendant intends to raise in its motion without the need for further court intervention. If the parties are unable to reach an agreement with regard to these issues, Defendant submits the following proposed Revised Scheduling Order:

- Defendant to submit its motion to dismiss the Complaint by November 3, 2023;
- Plaintiff to submit opposition, if any, by November 27, 2023; and
- Defendant to submit any reply by December 8, 2023.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Amanda Blair
Amanda M. Blair
FISHER & PHILLIPS LLP

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